



Your Total Dog Registry Since 1898

October 20, 2015

RE: House Bill 4898

Dear Members of the Michigan House Appropriations Committee:

My name is Sara Chisnell, attorney for United Kennel Club. Established in 1898, the United Kennel Club, based in Kalamazoo, Michigan, is the largest all-breed performance-dog registry in the world, registering dogs from all 50 states and 25 foreign countries. More than 60 percent of its 15,000 annually licensed events are tests of hunting ability, training and instinct. UKC prides itself on its family-oriented, friendly, educational events. The UKC has supported the "Total Dog" philosophy through its events and programs for over a century. As a departure from registries that place emphasis on a dog's looks, UKC events are designed for dogs that look and perform equally well. There are nearly 34,000 dogs registered with UKC in the state of Michigan.

UKC commends the idea and intent behind House Bill 4898, which seeks to amend the current law regulating pet shops and animal shelters, but is very concerned about the definition of "large-scale commercial dog breeding kennel." UKC has suggested an amendment to the definition that would be more narrowly tailored, will truly target the commercial kennels by adding a commercial component, and is included in other states' laws, but thus far it has been ignored. In addition to the threshold of "more than 15 female intact dogs" our amendment would add "and that sells more than 60 puppies or dogs in a calendar year." Enforcement of HB 4898, without a more narrowly-tailored definition, will be vast due to high number of breeders unnecessarily brought in through the current overly broad and vague definition, and will be burdensome and costly to the Michigan Department of Agriculture and Rural Development that already cannot effectively inspect, register, and regulate the current load of pet shops and shelters.

UKC has also drafted and suggested an amendment that includes exceptions for breeders of working, show, hunting, and performance dogs. UKC believes that the health and well-being of dogs are of the utmost importance, and are significant concerns. However, UKC believes that breeders who are active with their dogs ARE the responsible breeders and ostensibly not the target of this legislation. In fact, representatives for Michigan Humane Society testified to that very fact and want to exempt hunting, sporting, mushing, and other purpose-bred dogs.

UKC urges you to oppose this bill if the amendments to further clarify the commercial breeder definition are not included. On behalf of responsible Michigan dog breeders, I appreciate your time and consideration of this matter.

Sincerely,

Sara Chisnell
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UNITED KENNEL CLUB

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United Kennel Club Amendments to HB 4898

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(M) "LARGE-SCALE DOG BREEDING KENNEL" MEANS A FACILITY WHERE MORE THAN 15 FEMALE INTACT DOGS OVER THE AGE OF 4 MONTHS ARE HOUSED OR KEPT IN 1 PHYSICAL LOCATION FOR THE PRIMARY PURPOSE OF BREEDING, AND THAT SELLS MORE THAN 60 PUPPIES OR DOGS IN A CALENDAR YEAR. A LARGE-SCALE COMMERCIAL DOG BREEDING KENNEL DOES NOT INCLUDE A PERSON OR BREEDER WHO KEEPS, BREEDS, AND/OR TRAINS DOGS FOR THE PURPOSE OF HUNTING, HERDING, GUARDING LIVESTOCK OR OTHER ANIMALS, TRACKING, SERVICE OR ASSISTANCE, DOG-POWERED SPORTS, OR EXHIBITING IN DOG SHOWS, PERFORMANCE EVENTS, FIELD TRIALS, HUNT TESTS, OR OTHER TYPE OF RECOGNIZED DOG EVENT.

UKC acknowledges that problematic and uncaring breeders do exist, but are far from an epidemic in this state. Current cruelty and neglect laws are more than sufficient to take action against the bad actors, and are in fact more appropriate to actually punish them. Not only does “commercial kennel” licensing have no place in the pet shop and shelter law, it has no actual teeth beyond requiring licensing. The kennels with terrible conditions and poor treatment of dogs will be ultimately charged under cruelty and neglect laws, which renders this unnecessary.

IF the commercial kennel definition MUST be included, it needs to be narrowly tailored so as not to be over-inclusive. This amendment narrows the definition so as not to be overly broad and include more than MDARD can handle, does not sweep in the responsible breeders, and will properly target the problematic “puppy mills.” The definition was taken from wording other states already have in successful regulations. For example, in Pennsylvania, where an actual problem has been demonstrated to exist unlike in Michigan, a commercial kennel is defined as one that breeds dogs and sells to dealer or pet shop OR sells more than 60 dogs in a calendar year. The proposed amendment clearly delineates between a commercial, retail kennel and a hobby, sport, performance, or training kennel—those are the responsible breeders and not the target of this legislation.